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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jaylynn Dean v. Uber Technologies,  
Inc., et al., No. 3:23-cv-06708*

Case No. 3:23-md-03084-CRB  
**DECLARATION OF DANIEL  
CUMMINGS IN SUPPORT OF  
DEFENDANTS' AMENDED  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

I, Daniel Cummings, declare:

1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bars of the States of Missouri, Kansas, and Nebraska. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s Amended Administrative Motion to Consider Whether Another Party’s Materials Should Be Filed Under Seal.

Because the materials at issue were designated confidential by Plaintiffs, or Plaintiffs have otherwise requested that they be maintained under seal, Defendants filed the following under seal:

Document	Description	Designating Party
<b>Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Motion containing name of third-party witness, S.M.	Sealed at Plaintiffs’ request
<b>Declaration of Johnathan Schneller in Support of Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Declaration containing name of third-party witness, S.M.	Sealed at Plaintiffs’ request
<b>Exhibit 6 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Bruce Weiner dated September 26, 2025, marked as Confidential.	Plaintiffs
<b>Exhibit 8 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of transcript of June 27, 2025 deposition of Plaintiff Jaylynn Dean.	Sealed at Plaintiffs’ request
<b>Exhibit 9 to Defendants’ Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of transcript of July 22, 2025 deposition of third-party witness S.M., marked as Highly Confidential – Attorneys’ Eyes Only.	Plaintiffs

Document	Description	Designating Party
<b>Exhibit 10 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Tempe Police Department records Bates stamped as JDean-TempePD-000001-25 and marked as Confidential – Attorney Eyes Only	Plaintiffs
<b>Exhibit 20 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Veronique Valliere dated September 26, 2025, marked as Confidential	Plaintiffs
<b>Exhibit 21 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of Appendix D of expert report of Lacey R. Keller dated September 26, 2025, marked as Confidential	Plaintiffs

2. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of November, 2025.

/s/ Daniel Cummings  
**Daniel Cummings**